

November 23, 2015

Dear Division of the State Architect,

Thanks for your work to create statewide standards for accessibility of electric vehicle charging stations. I think the effort is important and that all EVCS users will benefit from uniform standards applied throughout the State.

However, I think that the current proposed language may have the unintended consequence of reducing the deployment of EV charging stations at a time when deployment is already behind goals based on the Governor's Executive Order (March 23, 2012) to establish adequate infrastructure to support one million zero-emission vehicles in California. Greenhouse gas emissions from transportation are the single largest category of contributing sectors in California; in 2013, California's transportation emissions created 37% of the total statewide greenhouse gas emissions.

Electrifying transportation is critical component of bringing the greenhouse gas emissions associated with transportation down. Thanks to our State's Renewal Portfolio Standard, in many regions of California, driving an electric vehicle in place of a conventional car, reduces the greenhouse gas emissions associated with its travel by 70%. In addition, electric vehicles remove tailpipe emissions that contribute to other air quality problems that are connected with serious health issues including asthma.

I worry that as proposed, the language for accessible electric vehicle charging stations will act to halt the installation of more than 4 EVCS in any off-street parking lot or garage, regardless of its parking capacity and the demand for EV charging in the area.

The reason is simple economics; the 5th EVCS would require significantly more real estate (to create it as a standard accessible EVCS with its associated access aisle and path of travel) and would trigger marking the existing van accessible EVCS with an International Symbol of Accessibility (ISA). Although in most instances, the ISA implies design without exclusion (e.g. public water fountains, bathroom stalls, fitting rooms, etc. are designed for accessibility, but can be used by anyone), when it comes to placing vehicles, the ISA is very exclusive – only vehicles with ADA placards/plates can be there. As a result, a property owner would have to invest a significant amount of space (money) to an EVCS that few vehicles would be eligible to use. At a parking lot with 5 EVCS, 40% of the EVCS would be designed for accessibility and 20% would be restricted to users with ADA placards or plates. This ratio does not align with the number of Californians with accessibility needs; it far exceeds it. And, as a result, the proposed Code language will restrict the availability of EVCS for all users because property owners simply won't install them (even though CALGreen will require electrical panel capacity and conduit to enable future EV charging station installation).

Please alter the proposed Code language to bring the number of accessible EVCS into alignment with the standards for accessible parking in California. There is no reason for accessible EVCS to exceed the accessible parking standard; doing so simply limits the deployment of EV charging stations and everyone's ability to access them.

I think that the Agency proposed modifications should be approved as amended because they do not meet the criteria of Health & Safety Code Sections 18930(a) (1), (4) and (5):

11B-812.8 Identification signs. *EVCS identification signs shall be provided in compliance with Section 11B-812.8.*

11B-812.8.1 ~~Twenty-five~~Four or fewer. *Where ~~twenty-five~~ four or fewer total EVCS are provided, identification with an International Symbol of Accessibility (ISA) shall not be required.*

11B-812.8.2 ~~Five to twenty-five.~~ *Where ~~five to twenty-five~~ total EVCS are provided, one van accessible EVCS shall be identified by an ISA complying with Section 11B-703.7.2.1. The required standard accessible EVCS shall not be required to be identified with an ISA.*

11B-812.8.23 Twenty-six or more. *Where twenty-six or more total EVCS are provided, all required van accessible and all required standard accessible EVCS shall be identified by an ISA complying with Section 11B-703.7.2.1.*

11B-812.8.34 Ambulatory. *Ambulatory EVCS shall not be required to be identified by an ISA.*

11B-812.8.45 Drive-up. *Drive-up EVCS shall not be required to be identified by an ISA.*

11B-812.8.56 Finish and size. *Identification signs shall be reflectorized with a minimum area of 70 square inches (45,161 mm²).*

In addition, Table 11B-228.3.2.1 should be modified, as follows:

TABLE 11B-228.3.2.1
ELECTRIC VEHICLE CHARGING STATIONS FOR
PUBLIC USE AND COMMON USE

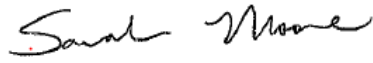
<u>Total Number of EVCS at a Facility¹</u>	<u>Minimum Number (by type) of EVCS Required to Comply with Section 11B-812¹</u>		
	<u>Van Accessible</u>	<u>Standard Accessible</u>	<u>Ambulatory</u>
1 to 25	1	0	0
26 to 50	1	1	0
51 to 75	1	1	1
76 to 100	1	2	2
101 and over	1, plus 1 for each 300, or fraction thereof, over 100	2, plus 1 for each 60, or fraction thereof, over 100	2, plus 1 for each 50, or fraction thereof, over 100

Notes:

1. Where an EV charger can simultaneously charge more than one vehicle, the number of EVCS provided shall be considered equivalent to the number of electric vehicles that can be simultaneously charged.

Thank you for your consideration of these modifications and for your important work in this area.

Sincerely,

A handwritten signature in black ink that reads "Sarah Moore". The signature is written in a cursive style with a small red dot under the 'a' in Sarah.

Sarah Moore